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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

SPOT TECH HOUSE, LTD., *formerly
known as*, SPOT OPTION, LTD.;

MALHAZ PINHAS
PATARKAZISHVILI, *also known as*
PINI PETER and PINHAS PETER;

and RAN AMIRAN,

Defendants.

Case No. 2:21-cv-00632

**REQUEST BY PLAINTIFF
SECURITIES AND EXCHANGE
COMMISSION FOR CLERK TO
ENTER DEFAULT AGAINST
DEFENDANTS MALHAZ
PINHAS PATARKAZISHVILI
AND SPOT TECH HOUSE, LTD.**

TO THE CLERK OF THE COURT AND TO THE DEFENDANTS:

PLEASE TAKE NOTICE that Plaintiff Securities and Exchange Commission (“SEC”) hereby requests that the Clerk, in accordance with Rule 55(a) of the Federal Rules of Civil Procedure, enter a default against Defendants Malhaz Pinhas Patarkazishvili (“Pinhas Peter”) and Spot Tech House, Ltd. (“Spot Option”) for failure to answer, plead, or otherwise respond to the Complaint.

1 As evidenced by the Docket (including the filed declaration of Samantha M.
2 William in the form of a certificate of service, located at Docket No. 10) and the
3 supporting Declaration of Kenneth Donnelly hereto:

4 1) By Order dated June 11, 2021, the Court granted the SEC's motion for
5 alternative service of process, which authorized the SEC to serve all Defendants with
6 the Summons and Complaint by serving copies of those papers on their U.S.-based
7 attorney, Jeff Ifrah, via email and mail. *See* Dkt. 9 at 3 ("The Court grants the SEC's
8 motion to serve Defendants via email to their US-based attorney and adds that the
9 SEC must also serve the attorney via mail."). This Order also authorized the SEC to
10 "attempt service by Federal Express to the Defendants' addresses in Israel." *Id.*

11 2) At Docket No. 10, the SEC has filed a Certificate of Service on all
12 Defendants pursuant to the June 11, 2021 Order. This Certificate evidences proof of
13 service of the Summons and Complaint upon Defendants Pinhas Peter and Spot
14 Option via emailing and mailing of the papers to U.S.-based attorney, Mr. Ifrah. As
15 set forth in the Certificate, copies of the Summons and Complaint (and the civil cover
16 sheet) were sent by email and postal mail to Mr. Ifrah, on June 16 and June 17, 2021,
17 respectively. Dkt. 10 at 2. Moreover, the tracking information from USPS Tracking,
18 as assigned to the mailed package, indicates that the papers were received by Mr.
19 Ifrah's law firm on June 18, 2021. *Id.* at 5 ("Your item was delivered in or at the
20 mailbox at 5:13 pm on June 18, 2021 in WASHINGTON, DC 20006.").

21 3) The Certificate at Docket No. 10 also evidences that another copy of the
22 Summons and Complaint was successfully delivered by Federal Express to Defendant
23 Pinhas Peter at his address in Israel. As set forth in the Certificate, the SEC delivered
24 to Federal Express sealed, pre-paid envelopes designated by Federal Express
25 containing the Summons and Complaint (and the civil sheet), and Federal Express
26 indicates by its tracking information that the package addressed to Pinhas Peter in
27 Israel was in fact delivered on June 24, 2021 at 1:23 pm. *See* Dkt. 10 at 2-3 and 7
28 (showing delivery to the address at "Herzliya, Israel" and "signed for by: P. Malaz").

1 4) Based on service having been completed via U.S.-based counsel no later
2 than June 18, 2021, the answers or other responses of Defendants Pinhas Peter and
3 Spot Option were due under Fed. R. Civ. P. 12(a)(1)(A)(i) on July 9, 2021.

4 5) As of this date, neither the Court nor the SEC has received an answer or
5 other Rule 12 response by these defendants to the Complaint.

6
7 Dated: October 15, 2021

/s/ Kenneth W. Donnelly
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